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REGULATORY AUTH.

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Carolyn Tatum Roddy
Attorney, State Regulatory

February 18, 1999

VIA HAND DELIVERY

Mr. David Waddell
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

In re: Proceeding for the Purpose of Addressing Competitive Effects of Contract Service Arrangements Filed by BellSouth Telecommunications, Inc. in Tennessee, Docket No. 98-00559

Dear Mr. Waddell:

Please find enclosed the original and thirteen (13) copies of the Response of Sprint Communications Company L.P. ("Sprint") to BellSouth Telecommunications Inc.'s ("BellSouth") Motion to Compel Discovery and Motion of Sprint Communications Company L.P. to Accept Late-Filed Response in the above referenced proceeding.

An extra copy of this transmittal letter is included which I would ask that you please date stamp and return to me for my files in the enclosed self-addressed stamped envelope.

Thank you for your cooperation.

Respectfully submitted,

Carolyn Tatum Roddy

Carolyn Tatum Roddy

CTR: hs
cc: Parties of Record

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

In Re:

Proceeding for the Purpose of Addressing)
Competitive Effects of Contract Service) Docket No. 98-00559
Arrangements Filed by BellSouth)
Telecommunications, Inc. in Tennessee)

**RESPONSE OF SPRINT COMMUNICATIONS COMPANY L.P.
TO BELL SOUTH TELECOMMUNICATIONS, INC.
MOTION TO COMPEL DISCOVERY**

Comes now Sprint Communications Company L.P. (“Sprint”) and files this its Response to BellSouth Telecommunications, Inc. (“BellSouth”) Motion to Compel Discovery in the above-captioned proceeding as follows:

BellSouth objects to Sprint’s responses to First Data Requests Nos. 2 and 3, and First Data Requests Nos. 6, 7, 8, 9, 10, 11, 12 and 13. Sprint believes that the Data Requests are irrelevant to the issues to be addressed by the Tennessee Regulatory Authority (“TRA”) in this proceeding. Further, Sprint believes that BellSouth’s requests are over-broad and were merely designed to cloud the issue presented in the proceeding concerning the competitive effects of Contract Service Arrangements (“CSAs”) filed by BellSouth.

First Data Requests Nos. 2 and 3. BellSouth complains that Sprint “(r)ather than answer the question that it had been asked—whether it contends that any of

BellSouth's CSAs is anticompetitive—Sprint elected instead to extol the virtues of 'Fresh Look'. Sprint fully responded to this request and strongly objects to BellSouth's efforts to force Sprint to offer detailed analysis of BellSouth's CSAs before it is clear what the TRA intends the focus of this proceeding should be. Sprint asserted that CSAs were not inherently anti-competitive but could have anti-competitive impacts and outlined general policies embodied in the "Fresh Look" proceeding to foster competition in the local exchange marketplace. This proceeding was initiated by the TRA for the purpose of addressing competitive effects of Contract Service Arrangements filed by BellSouth Telecommunications, Inc. in Tennessee" and has in no way shifted a burden of proving that "any of BellSouth's CSAs is anticompetitive" onto the intervenors. Sprint set out the policies which should govern the TRA's examination of the competitiveness of BellSouth's CSAs. Sprint is not required to examine each CSA and prove that it is anti-competitive. The discovery requests were broadly -worded and intrusive and Sprint, therefore, strongly objects to the BellSouth Motion to Compel further response.

First Data Requests Nos. 6, 7, 8, 9, 10, 11, 12, and 13. BellSouth also seeks to require Sprint to answer Data Requests concerning the use of CSAs by Sprint Communications Company L.P.'s parent, subsidiaries, and affiliates. Though not stated, BellSouth is obviously seeking information about United-Southeast, a Sprint Corporation-owned local exchange company in Tennessee. United is not a party to this proceeding and BellSouth can not use the intervention of Sprint Communications Company L.P., a company operationally separate from United, to compel a response which is unavailable. Sprint made every effort to provide the information BellSouth requested. Sprint, hereby, objects to BellSouth's efforts to extort information about a non-party from an operationally separate company that has no ready access to this information except through an examination of the public records equally open to BellSouth.

Further, and most importantly, BellSouth's request for discovery of CSAs offered by United is irrelevant to the question at hand. United does not provide service in BellSouth territory. The United CSAs, therefore, are not relevant to an examination of

the “competitive effects of contract service arrangements filed by BellSouth Telecommunications, Inc. in Tennessee.” This is supported by the transcribed statements made by Director Greer at the January 19, 1999 Director’s Conference which were attached to the Motion to Compel Discovery. Director Greer acknowledged that there might be some value to knowing the nature and extent of CSAs used by competitive local exchange carriers in BellSouth service territory. No statement was made in support of information about local exchange CSAs outside BellSouth territory and none can be. The focus of this proceeding is on the competitive effects of BellSouth’s CSAs. Information about United’s use of CSAs outside BellSouth territory is irrelevant to the issues at hand and should not be the subject of discovery.

Accordingly, Sprint urges the TRA to reject BellSouth’s Motion to Compel Discovery from Sprint.

This 18th day of February, 1999.

Respectfully submitted,
SPRINT COMMUNICATIONS COMPANY L.P.

A handwritten signature in cursive script that reads "Carolyn Tatum Roddy".

Carolyn Tatum Roddy
3100 Cumberland Circle – GAATLNO802
Atlanta, Georgia 30339-5930

BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

In Re:

Proceeding for the Purpose of Addressing)
Competitive Effects of Contract Service) Docket No. 98-00559
Arrangements Filed by BellSouth)
Telecommunications, Inc. in Tennessee)

**MOTION TO ACCEPT LATE-FILED RESPONSE
OF SPRINT COMMUNICATIONS COMPANY L.P.**

Comes now Sprint Communications Company L.P. ("Sprint") and files this its Motion to Accept Late-Filed Response in the above-captioned proceeding as follows:

1. The Re-Notice of Pre-Hearing Conference issued in this proceeding on February 4, 1999, by the Tennessee Regulatory Authority ("TRA") stated "Any response to a motion to compel must be filed not later than 4:30 PM on Thursday, February 16, 1999." This statement reflects a typographical error in that February 16, 1999, was a Tuesday rather than a Thursday. Sprint's interpretation was that its Response was due Thursday which happens to be February 18, 1999. Sprint requests that the TRA accept this filing as in compliance with the deadlines established in the Re-Notice or grant this Motion in light of the confusion caused by this obvious typographical error.

2. The granting of Sprint's Motion will not delay this proceeding or harm the parties. BellSouth Telecommunications, Inc. ("BellSouth") has stated that it will not oppose this Motion provided it receives adequate notice of the substance of Sprint's

responses prior to the Pre-Hearing Conference set for February 18, 1999. Sprint has agreed to provide BellSouth and Staff with timely notice.

Accordingly, Sprint requests that this Motion to Accept Late-Filed Response to BellSouth's Motion to Compel Discovery is GRANTED in the event it is determined that Sprint's Response to BellSouth's Motion to Compel Discovery is in fact late.

This 18th day of February, 1999.

Respectfully submitted,
SPRINT COMMUNICATIONS COMPANY L.P.

Carolyn Tatum Roddy

Carolyn Tatum Roddy
3100 Cumberland Circle – GAATLNO802
Atlanta, Georgia 30339-5930

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a true and exact copy of the within and foregoing Response of Sprint Communications Company L.P. to BellSouth Telecommunications, Inc.'s Motion to Compel Discovery and Motion of Sprint Communications Company L.P. to Accept Late-Filed Response, Docket No. 98-00559, via United States first-class mail, postage paid and properly addressed to the following:

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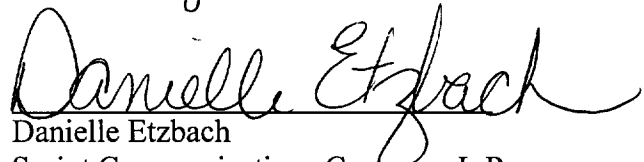
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Nashville, TN 37243

This the 19th day of February, 1999.

A handwritten signature in black ink, reading "Danielle Etzbach". The signature is fluid and cursive, with the first name "Danielle" and last name "Etzbach" clearly distinguishable.

Danielle Etzbach
Sprint Communications Company L.P.
External Affairs